

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

v.

CA. NO. 05-013 (GMS)

RAPHAEL WILLIAMS, ET AL

PLAINTIFF'S RESPONSE TO DEFENDANTS
COMBINED FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
PURSUANT TO FED R. CIV P#S 26, 33 AND 34.



DATE: 4/27/07

Jimmie Lewis
SBI # 506622

DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

" INTERROGATORIES " P.1

NO. 1(A), DUE TO THE NUMBER OF DEFENDANTS,
SAID REQUEST AS IT IS STATED CAN NOT BE
ADHERED TO WITHOUT SPECIFICALLY IDENTIFYING SAID
DEFENDANT; SEE ALSO 05-013 (GMS).

(B), SEE NO. 1 A

(C), SEE NO 1 A

(D), SEE NO 1 A

NO. 2 (A), SEE CA NOS 05-013 GMS,
05-051 GMS, 05-052 GMS AS WELL AS
THE CIVIL DOCKET SHEETS FOR SAID ACTIONS.

(B), A LITANY OF PERSONS

(C); SEE NO 2 (A).

NO. 3 (A), SEE NO 2 (A).

(B), ~~SEE~~ NO 2 (A)

(C), SEE NO 2 (A)

NO. 4 , SEE NO 2 (A)

NO. 5 , SEE NO 2 (A)

NO 6; SEE NO 2 (A)

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- NO 7. 1. THE ANTI-BIOTIC BACTRIM 7 TIMES
THROUGH OUT THE COURSE OF 1 1/2 YEARS
2. THE ANTI-BIOTIC AMOXICILIN
3. CLASSIFIED TO THE SHU FOR 14 MONTHS
4. THE SNU FOR 8 MONTHS
5. P.C , PROTECTIVE CUSTODY
6. STRESS TEST
7. UROLOGY CONSULTATION, DR JOSE M. GUECO MD.

NO 7(B), THIS QUESTION IS PREMATURE PENDING
DISCLOSURE OF DISCOVERY FROM RAPHAEL WILLIAMS, ETAL.

- NO 8 (A) 1. SCHIZOPHRENIA
2. ANTI SOCIAL PERSONALITY
3. TOE NAIL FUNGUS
4. HYPERTENSION
5. URINARY TRACT INFECTION
6. NASAL INFECTION
7. IRRITABLE BOWELS
8. CONSTIPATION
9. BROKEN PINKY FINGER, LEFT HAND
10. ATTEMPTED SUICIDE
11. POSSIBLE BRAIN DAMAGE
12. POSSIBLE KIDNEY AND/OR LIVER DAMAGE

(B) , SEE NO 2(A).

(C) , SEE NO 7(B)

(D) , SEE NO 7(B)

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NO. 9 (A) 1. SCHIZOPHRENIA

2. ANTI SOCIAL PERSONALITY

3. HERNIA LEFT TESTICAL

4. HYPERTENSION

5. CHICKEN POX

6. TONSILLITIS

7. BROKEN (LEG - LEFT), LEFT ARM, LEFT FOOT

8. GUNSHOT, LEFT HIP

(B) SEE NO 2(A),

(C) SEE NO 7(B),

(D) SEE NO 7(B).

NO. 10 SCHIZOPHRENIA

ANTI SOCIAL PERSONALITY

DR. JOSHI, DR CANNOLLI, ETAL.

TIMES: SINCE I WAS A CHILD OF 5 YEARS OLD.

NO 11. CONSPIRACY TO SALUDIFY MY OCT 21-23-03

CONVICTION.

DR. S. FOSTER IS THE ONLY PSYCHIATRIST

TO DIAGNOSE ME AS MALINGERING IN MY LIFE.

NO. 12. (A), SEE NO 2(A)

(B), SEE NO 2(A)

(C), SEE NO 2(A)

(D), SEE NO 2(A)

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NO. 13 (A), SEE NO 2 (A).

(B), SEE NO 2 (A).

(C) CHEST PAIN, PAIN IN LEFT HAND PINKY
FINGER, ABDOMINAL PAIN, BACK PAIN, PAIN IN TOES,
EMOTIONAL PAIN, CONSTIPATION, AMNESIA, INSOMNIA,
INJURY TO RIBS, INJURED LEGS - HEAD, INJURED NECK - FACE -
JAW, BURNING EYES - SKIN - LUNGS, SWOLLEN WRIST - EYES -
LIPS - NOSE, INJURED HAND.

(D), SEE NO 2 (A) AND 7 (B).

NO. 14. (A), SEE NO 2 (A),

(B), SEE NO 2 (A),

(C), SEE NO 13 (C).

(D), SEE NO 2 (A) AND 7 (B)

NO. 15 (A), SEE NO 2 (A)

(B), SEE NO 2 (A)

(C), SEE NO 13 (C)

(D), SEE NO 2 (A) AND 7 (B).

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NO. 16 (A), SEE NO 2(A)

(B), SEE NO 2(A)

(C), DAYS - WEEKS AND AS MUCH AS 3 MONTHS

TO 1 1/2 YEARS CONFINED TO QUARTERS UNLIKE OTHER

INMATE PRISONERS IN GENERAL POPULATION. DAMAGES:

EMOTIONAL DAMAGES, LOSS OF FAMILY (VISITS), LOSS OF REE,
LOSS OF RELIGIOUS SERVICES, LOSS OF WEIGHT, LOSS OF PHONE CALLS,
LOSS OF COMMISSARY PRIVILEGE, LOSS OF THE ABILITY TO DO
LEGAL RESEARCH PERSONALLY. LIKE OTHER INMATE PRISONERS
IN GENERAL POPULATION.

(D), SEE NO 2(A) AND 7(B)

NO. 17., SEE NO 2(A) AND 7(B).

NO. 18. DR JOSHI, DR ARUMBURU, DR ALI,

DR. ROGERS, DR. CANNULLI, DR. ROSE,

DR. BOSTON, DR. JOSE M. GUECO MD.

PLACES 3 H.R. Y. C. I; D. C. C AND

33B TROLLEY SQUARE WILM, DEL 19806

302-654-0997.

NO. 19. PER DEL RULES OF EVIDENCE 609:

CARTACKING 2ND, 5 YRS,

THEFT \$1000 OR MORE 2 YRS, RESISTING ARREST 1 YR.

MAY 26, 2003.

RESTITUTION

MENTAL HEALTH TREATMENT

ANGER MANAGEMENT

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NO 20. IRRELEVANT, ANSWER WILL NOT PRODUCE
EVIDENCE PERTAINING TO THIS CIVIL COMPLAINT
AND OR CA NO'S 05-013 GMS, 05-051 GMS
OR 05-052 GMS

NO. 21, SEE NO 20

NO. 22, SEE NO 2(A) AND 7(B)

NO 23, NONE

NO 24, SEE NO. 2(A)

"PRODUCTION OF DOCUMENT RESPONSE" P.7

NO. 1, SEE EA NO. 05-013 GMS, 05-051 GMS,
05-052 GMS AN THE CIVIL DOCKET SHEETS
FOR EACH CIVIL COMPLAINT.

ALSO, THIS QUESTION IS PREMATURE
DUE TO PENDING DISCLOSURE OF DISCOVERY

NO 2., SEE NO 1

NO. 3, SEE NO 1

NO. 4, SEE NO 1

NO. 5, SEE NO 1

NO. 6, SEE NO. 1

NO 7, SEE NO 1

NO. 8, SEE NO 1

NO. 9, SEE NO 1

NO. 10, SEE NO 1

NO. 11, SEE NO 1

NO 12., SEE NO 1

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NO. 13, SEE NO. 1

NO. 14, SEE NO. 1

NO 15, SEE NO. 1

NO. 16, SEE NO. 1

NO 17, OBJECTION, IRRELEVANT.

NO 18, SEE NO. 1

NO 19, SEE NO. 1

NO 20, SEE NO. 1

NO 21, SEE NO. 1

NO 22, SEE NO. 1

NO. 23, (A), NONE, (B) NONE, (C) NONE, (D) NONE.

NO 24. SEE NO. 1.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DOE HEREBY CERTIFY ON THIS 27TH DAY OF APRIL,
2007, THAT I DID MAIL ONE TRUE AND CORRECT
COPY OF PLAINTIFF'S RESPONSE TO DEFENDANTS
COMBINED FIRST SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS PURSUANT
TO FED R. CIV P#s 26, 33 AND 34 BY
U.S. POSTAL TO EACH OF THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

ERIKA Y TROSS
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 6TH FL
WILM, DEL 19801

DATE: 4/27/07

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DOI # 506622
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